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11 Attorneys for Plaintiffs and the Class

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

14 SCOTT KOLLER, CAROLYN BISSONETTE,
15 CECE CASTORO, STEPHEN FREIMAN,
16 DIANE GIBBS, DARLENE WILLIAMS, and
17 ROBERT GLIDEWELL, on behalf of
themselves, the general public and those similarly
situated,

18 Plaintiffs,

19 v.

20 MED FOODS, INC., and DEOLEO USA,
21 INC.

22 Defendants.

CASE NO. 14-cv-2400 (RS)

**DECLARATION OF REBECCA
SPECTOR IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND APPLICATION
FOR ATTORNEYS' FEES, COSTS AND
INCENTIVE AWARDS**

Date: August 9, 2018

Time: 1:30 p.m.

Dept: Courtroom 3, 17th Floor

Judge: Hon. Richard Seeborg

1 I, Rebecca Spector, declare as follows:

2 1. I am the West Coast Director for the Center for Food Safety (“CFS”). I make this
3 declaration on my own personal knowledge and could testify competently to the facts stated herein.

4 2. CFS is a nonprofit, public interest organization with over 900,000 members across the
5 country, including more than one hundred thousand in California. CFS is dedicated to protecting our
6 food, farmers and the environment. A flagship program of CFS is transparency in our food system
7 and protecting the public’s right to know. CFS has spearheaded U.S. public interest work in this area
8 since the organization’s inception in 1997. This work has two major components: promoting product
9 labeling and process transparency for consumers; and ensuring that labeling is accurate and not
10 misleading. To fulfill this mission, CFS has offices in Washington DC, San Francisco, CA, and
11 Portland, OR, with twenty full-time employees, including legal, science, policy, public outreach and
12 communications staffing.

13 3. For the past two decades, CFS has been a public interest leader in numerous important
14 labeling arenas and campaigns. These include but are not limited to: ongoing efforts to ensure
15 accurate, comprehensive nutrition labeling on food products; food safety and food recall disclosures,
16 including under the Food Safety Modernization Act of 2011; maintaining and expanding country of
17 origin labeling (COOL); establishing mandatory labeling for food products produced through genetic
18 engineering; establishing the “Certified Humane” label; and long-term efforts to establish parameters
19 for labeling foods as “Local” and “Climate Friendly.” CFS also helped establish the original 2001
20 USDA Organic labeling standards, and has vigilantly protected their integrity. As such, CFS is relied
21 on nationally and internationally as a principal source of policy, legal and scientific expertise for the
22 organic movement.

23 4. CFS’s program efforts in these relevant areas include but are not limited to: regulatory
24 and legislative drafting; policymaker, stakeholder, and public education; publication of books and
25 articles promoting the public’s right to know; the building and spearheading of broad coalitions;
26 market campaigns; establishing science-based standards and practices for labels; and grassroots
27 organizing. CFS also targets false and misleading labeling. Among recent actions CFS has taken on
28 this front are significant public education and media efforts to inform consumers about the misleading

1 nature of the unregulated “natural” label.

2 5. I am generally familiar with the subject matter of this litigation and the composition of
3 the class. I understand that the settling parties have agreed, with approval of the court to direct
4 settlement funds cy pres to CFS. If granted an award CFS will devote such funds to the most relevant
5 projects to the underlying litigation that produced the award, and I believe that the donation will
6 benefit the class and advance the purposes for which the lawsuit was brought. To summarize, this
7 includes but is not limited to our continuing, extensive work to defend and improve the integrity of
8 product ingredient labeling and various product labels; public “Right to Know” education for food
9 products; and scientific and legal efforts to improve oversight and labeling of food products and their
10 ingredients. This involves both major campaigns for more extensive labeling of ingredients and
11 targeting false and misleading labeling.

12 6. CFS has been approved by courts as a cy pres recipient in at least one other class
13 action law suit: Golloher v. Todd Christopher International, Inc. (N.D. Cal. Case No. 3:12-cv-
14 06002-RS).

15 This declaration was executed this 28th day of June, 2018, at San Francisco, California. I state
16 the foregoing under penalty of perjury under the laws of the United States.

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21 _____
Rebecca Spector